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Attorneys for Intervenors and Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DISABILITY RIGHTS OREGON,
METROPOLITAN PUBLIC DEFENDERS
INCORPORATED, and A.J. MADISON,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as
Director of Oregon Health Authority,
DOLORES MATTEUCCI, in her official
capacity as Superintendent of the Oregon
State Hospital,

Defendants,

and

Case No. 3:02-cv-00339-MO (Lead Case)
Case No. 3:21-cv-01637-MO (Member Case)
Case No. 6:22-CV-01460-MO (Member Case)

**DECLARATION OF ROBIN
HENDERSON IN SUPPORT OF MOTION
TO DISSOLVE OR MODIFY THE
SEPTEMBER 1, 2022 INJUNCTION**

**By Intervenors and Plaintiffs Legacy
Emanuel Hospital & Health Center d/b/a
Unity Center for Behavior Health, Legacy
Health System, PeaceHealth, and
Providence Health & Services – Oregon**

Oral argument: November 21, 2022, 1:30 PM

DECLARATION OF ROBIN
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MOTION TO DISSOLVE OR MODIFY
THE SEPTEMBER 1, 2022 INJUNCTION

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LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH, LEGACY
HEALTH SYSTEM, PEACEHEALTH, and
PROVIDENCE HEALTH & SERVICES –
OREGON,

Intervenors.

JAROD BOWMAN, JOSHAWN
DOUGLAS-SIMPSON,

Plaintiffs,

v.

DOLORES MATTEUCCI, Superintendent of
the Oregon State Hospital, in her individual
and official capacity, PATRICK ALLEN,
Director of the Oregon Health Authority, in
his individual and official capacity,

Defendants,

and

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH LEGACY
HEALTH SYSTEM, PEACEHEALTH, and
PROVIDENCE HEALTH & SERVICES,

Intervenors.

Case No. 3:21-cv-01637-MO (Member Case)

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER d/b/a UNITY CENTER
FOR BEHAVIORAL HEALTH; LEGACY
HEALTH SYSTEM; PEACEHEALTH; and
PROVIDENCE HEALTH & SERVICES
OREGON,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as
Director of Oregon Health Authority,

Defendant.

Case No. 6:22-CV-01460-MO (Member Case)

I, Robin Henderson, PsyD, do hereby declare as follows:

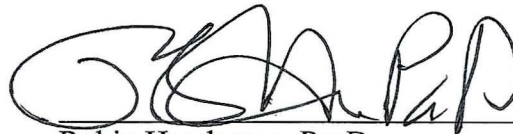
1. I am the Chief Executive of Behavioral Health for Providence Health & Services in Oregon. I make this declaration based on personal knowledge.

2. I have a Doctor of Psychology (PsyD) degree from George Fox University, and a post-doctoral degree in integrated health psychology.

3. I am limited in what I can disclose pursuant to the Health Insurance Portability and Accountability Act of 1996 (HIPAA). However, I can confirm that in October of 2022, a patient who had been charged with a felony for unlawful use of a weapon was abruptly discharged from the Oregon State Hospital pursuant to the September 1, 2022 injunction, placed on a Magistrate's hold, and transferred to Providence St. Vincent Medical Center without any notice. Attached as Exhibit 1 is a true copy of an article that was published in the Willamette Week about this situation.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATE: November 17, 2022



Robin Henderson, PsyD